



# U.S. Environmental Protection Agency Applicability Determination Index

Control Number: 0300088

**Category:** NSPS  
**EPA Office:** Region 10  
**Date:** 01/29/1999  
**Title:** Initial Performance Test  
**Recipient:** Janet Platt  
**Author:** Raymond Nye

**Subparts:** Part 60, A, General Provisions  
Part 60, GG, Stationary Gas Turbines

**References:** 60.8(a)  
60.8(b)(4)

**Abstract:**

Q: Will EPA grant a source test waiver for one of two identical natural gas-fired turbines subject to NSPS Subpart GG at the Badami Project?

A: Yes. Testing on one of the two identical turbines can be waived if one turbine is tested and the NOx concentration in the exhaust from the tested unit is less than half of the applicable standard.

**Letter:**

Reply To  
Attn Of: OAQ-107

Ms. Janet D. Platt  
Supervisor, Environmental Compliance  
HSE Alaska  
BP Exploration (Alaska) Inc.  
P.O. Box 196612  
Anchorage, Alaska 99519-6612

Dear Ms. Platt:

This letter is in response to your January 20, 1999 letter requesting EPA Region 10 grant a source test waiver for one of two identical natural gas-fired turbines subject to 40 C.F.R. Part 60, Subpart GG - Standards of Performance for Stationary Gas Turbines. The two Solar Mars 90 turbines, GT-0001A and GT-0001B, are located at the Badami Development Project on the North Slope of Alaska. BP Exploration proposes to test one turbine per Sec. 60.8(a) so as to demonstrate compliance with the nitrogen oxides (NOx) standard for both turbines.

In your January 20, 1999 letter to EPA Region 10, you indicate that the turbines are physically identical and combust the same fuel. You indicate that the turbines will be utilized for the same duty, thus EPA Region 10 understands that the turbines will be operated similarly. You indicate that the turbines are equipped with dry low NOx technology. Information provided by the vendor indicates that the Solar Mars 90 turbine emits less than 56 ppm NOx.

Per Sec. 60.8(b)(4), the Administrator has the authority to waive the requirement for an initial performance test in cases where a source owner or operator can demonstrate by other means that an affected facility is in compliance with an applicable standard. On August 7, 1995, the authority to grant such waivers was delegated to EPA regional offices. In at least five other cases, EPA has waived the requirement to conduct an initial NOx performance test for a turbine because NOx concentrations observed during performance testing on an identical unit were well below an applicable standard.

Based upon the precedent established by these previous waivers, testing on one of the two Solar Mars 90 turbines at Badami Development Project can be waived if one turbine is tested and the NOx concentration in the exhaust from the tested unit is less than half of the applicable standard.

If you have any questions, please contact Daniel Meyer of this office at 206-553-4150.

Sincerely,

Raymond Nye  
Federal and Delegated Air Programs

cc: Ms. Alison Cooke, BP Exploration (Alaska) Inc. Mr. John A. Pavitt, USEPA Region 10 - Alaska Operations Office Mr. Bob Cannone, ADEC - Fairbanks Mr. Mehrdad Nadem, ADEC - Fairbanks